



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-N

Jay Dunbar, Greys River District Ranger
Bridger-Teton National Forest
Greys River Ranger District
P.O. Box 339
641 N. Washington St.
Afton, WY 83100

Re: Upper Greys Vegetation Management Project
Draft EIS: CEQ #20090157

Dear Mr. Dunbar:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the Upper Greys Vegetation Management Project on the Bridger-Teton National Forest (BTNF) in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C 4231 and Section 309 of the Clean Air Act. The Greys Ranger District proposes to conduct timber harvest of 362 acres in the upper Greys River Watershed. The proposed activities are anticipated to take place over a three to ten year period and include harvesting 92 acres using partial-cut methods, 270 acres using clear cut methods, reconstructing three miles of roads, and constructing 3.15 miles of temporary road, which will be rehabilitated after use.

The DEIS provides a good narrative summary, references water quality assessments, and adequately addresses most of the comments included in the scoping letter. Chapter 3 of the DEIS, discusses vegetation and disturbance processes and fuels, provides valuable information regarding forest composition and structure, natural succession and disturbance ecology, fire regimes, fuels and fire risks. Vegetative treatments are a sustainable approach to reduce fire risks, susceptibility to insect and disease agents, increase structural diversity, and restore vegetative communities that are in decline.

We note that soil and water conservation Best Management Practices (BMPs) will be used for controlling non-point pollution sources; meeting soil and water quality goals and protecting beneficial uses. Use of appropriate BMPs, management requirements and design criteria, should minimize adverse effects to water quality or beneficial uses. In addition, it appears that there is significant local interest and public concern for maintaining good water quality in the watershed basin.

Finally, EPA is pleased that the harvesting activities will occur away from streams and riparian areas and that new road construction proposed during harvesting will not likely impact these riparian areas. EPA recommends that the Final EIS establish a water quality monitoring protocol to document existing conditions and to track effectiveness of the management practices.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the proposed action presented in this DEIS as "EC-1" (Environmental Concerns – Adequate) under EPA's rating criteria. The "EC" rating means that our review has identified environmental impacts that should be avoided in order to fully protect the environment. The "1" rating signifies that the DEIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. An explanation of the rating criteria is enclosed.

Thank you for the opportunity to provide comments on the DEIS. If you have any questions or would like to discuss our comments, please contact me at (303-312-6004) or you may contact Sarah Hester of my staff at (303-312-6008).

Sincerely,

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure